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June 23, 2014

United States Attorney
Eastern District of New York
610 Federal Plaza
Central Islip, NY 11722
Attn: Carrie N. Capwell
Assistant U.S. Attorney

RE: United States v. Philip Kenner & Tommy C. Constantine
Docket Number: 13-CR-607 (JFB)

Dear Ms. Capwell:

In reply to your letter of June 18, 2014, I was sensitive to the potential Brady material originating from the grand jury proceedings in the Southern District of New York and intended to incorporate a request for such material as part of my pre-trial motion. Your usual professionalism and integrity has obviated the need for such a request by way of motion. Thank you.

And “yes” I do find some of the material in the transcripts to be “helpful” to the defense.

Very truly yours,

Richard D. Haley

RICHARD D. HALEY

RDH/jm
cc: Joseph Conway, Esq. via ECF

